

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

DARLINGTON AMADASU,	:	
	:	Case No. 1:01-cv-210
Plaintiff,	:	
	:	Judge Dlott
v.	:	Magistrate Judge Black
	:	
JAMES R. DONOVAN, M.D., <i>et al.</i> ,	:	<b>OHIO DEFENDANTS' RULE 26(a)(1)</b>
	:	<b><u>DISCLOSURES</u></b>
Defendants.	:	

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendants University of Cincinnati ("UC") James R. Donovan, Andrew G. Freeman, Debra Ann Middaugh, Muriel Pohl, Dora Jefferson-Gaynor, Ralph Charles Buncher, Judy L. Jarrell, Tracy Herrman, and Andrew T. Filak (collectively "the Ohio Defendants") provide the following initial disclosures to Plaintiff Darlington Amadasu ("Amadasu").

1. As prescribed by Rule 26(a)(1)(A), the individuals listed below are likely to have discoverable that the Ohio Defendants may use to support their defenses, other than solely for impeachment. The Ohio Defendants reserve the right to supplement this list as the case progresses.

The subjects of information listed are not all-inclusive, each individual may have knowledge of subject other than that stated below:

	Name	Subject(s) of Information
1	Ralph Charles Buncher Environmental Health Kettering G39 P.O. Box 670056 Cincinnati, Ohio 45267-0056 (513) 558-1410	Amadasu's participation in UC's residency training program and some of the allegations in the Complaint.

	Name	Subject(s) of Information
2	James R. Donovan, M.D. Environmental Health Kettering P.O. Box 670056 Cincinnati, Ohio 45267-0056 (513) 558-5701	Amadasu's participation in UC's residency training program and some of the allegations in the Complaint.
3	Andrew T. Filak, M.D. College of Medicine MSBE-251F P.O. Box 670555 Cincinnati, Ohio 45267-0555 (513) 558-7342	Amadasu's participation in UC's residency training program and some of the allegations in the Complaint.
4	Andrew G. Freeman, M.D. Environmental Health Kettering G18 P.O. Box 670056 Cincinnati, Ohio 45267-0056 (513) 558-0037	Amadasu's participation in UC's residency training program and some of the allegations in the Complaint.
5	Dora Jefferson-Gaynor (address unknown)	Amadasu's participation in UC's residency training program and some of the allegations in the Complaint.
6	Tracy Herrmann Science and Allied Health Building, Room 104 Raymond Walters College 9555 Plainfield Road Blue Ash, Ohio 45236 (513) 745-5615	Amadasu's participation in UC's residency training program and some of the allegations in the Complaint.
7	Judy L. Jarrell Environmental Health Occupational Medicine WHERRY G-24 P.O. Box 670056 Cincinnati, Ohio 45267-0056 (513) 558-1729	Amadasu's participation in UC's residency training program and some of the allegations in the Complaint.

	Name	Subject(s) of Information
8	James E. Lockey, M.D. Environmental Health Kettering G12A P.O. Box 670056 Cincinnati, Ohio 45267-0056 (513) 558-0030	Amadasu's participation in UC's residency training program and some of the allegations in the Complaint.
9	Debra Ann Middaugh, M.D. Environmental Health Kettering P.O. Box 670056 Cincinnati, Ohio 45267-0056 (513) 558-0030	Amadasu's participation in UC's residency training program and some of the allegations in the Complaint.
10	Muriel Pohl, M.D. (address unknown)	Amadasu's participation in UC's residency training program and some of the allegations in the Complaint.

2. As prescribed by Rule 26(a)(1)(B), copies of documents that are in the possession, custody, or control of the Ohio Defendants, and which the Ohio Defendants may use to support their defenses, other than solely for impeachment, are available for inspection at the offices of Taft, Stettinius & Hollister at a mutually agreeable time.

3. As prescribed by Rule 26(a)(1)(D), an insurance agreement under which a person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy any such judgment will be produced for inspection at the offices of Taft, Stettinius & Hollister at a mutually agreeable time.

Respectfully submitted,

James Petro, Attorney General

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Attorneys for the Ohio Defendants

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Ohio Defendants' Rule 26(a)(1) Disclosures was served upon Darlington Amadasu, Plaintiff Pro Se, at P.O. Box 6263, Cincinnati, Ohio 45206, and upon Ramiro Canales, counsel for Claudia Miller, Roger Perales, and the University of Texas Health Science Center at San Antonio, at Assistant Attorney General for the State of Texas, General Litigation Division, P.O. Box 12548, Capitol Station, Austin, TX 78711-2548 via regular United States mail, postage prepaid, this 15th day of July, 2004.

/s/ Gregory Parker Rogers  
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